

AO 257 (Rev. 6/78)

DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION - IN U.S. DISTRICT COURT
 BY: ☐ COMPLAINT ☒ INFORMATION ☐ INDICTMENT
☒ SUPERSEDING
OFFENSE CHARGED

Title 18, United States Code, Section 1344(1) and (2) - Bank Fraud

☐ Petty
☐ Minor
☐ Misdemeanor
☒ Felony

PENALTY: 30 years imprisonment; 1,000,000.00 fine; 5 years supervised release; special assessment.

Name of District Court, and/or Judge/Magistrate Location

NORTHERN DISTRICT OF CALIFORNIA

SAN FRANCISCO DIVISION

DEFENDANT - U.S.

ADAM SHAFI

DISTRICT COURT NUMBER

CR 15-0582 WHO

PROCEEDING

Name of Complainant Agency, or Person (& Title, if any)

Federal Bureau of Investigation

☐ person is awaiting trial in another Federal or State Court, give name of court☐ this person/proceeding is transferred from another district per (circle one) FRCrp 20, 21, or 40. Show District
☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:
☐ U.S. ATTORNEY ☐ DEFENSESHOW
DOCKET NO.
☒ this prosecution relates to a pending case involving this same defendant
MAGISTRATE
CASE NO.
☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

Name and Office of Person

Furnishing Information on this form Alex G. Tse

☒ U.S. Attorney ☐ Other U.S. Agency

Name of Assistant U.S.

Attorney (if assigned) Elise LaPunzina

DEFENDANT**IS NOT IN CUSTODY**

Has not been arrested, pending outcome this proceeding.

1) ☐ If not detained give date any prior summons was served on above charges2) ☐ Is a Fugitive3) ☒ Is on Bail or Release from (show District)

Northern District of California

IS IN CUSTODY4) ☐ On this charge5) ☐ On another conviction☐ Federal ☐ State6) ☐ Awaiting trial on other charges

If answer to (6) is "Yes", show name of institution

 Has detainer been filed? ☐ Yes ☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted**ADDITIONAL INFORMATION OR COMMENTS****PROCESS:**☐ SUMMONS ☒ NO PROCESS* ☐ WARRANT

Bail Amount: _____

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

* Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time: _____ Before Judge: _____

Comments:

ALEX G. TSE (CABN 152348)
United States Attorney

FILED
2018 DEC -6 P 1:46
SUSAN Y. SOONG
CLERK, US DISTRICT COURT
NO. DIST. OF CA.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) NO. CR 15-0582 WHO
Plaintiff,)
v.) VIOLATIONS: 18 U.S.C. §§ 1344(1) and (2) – Bank
ADAM SHAFI,) Fraud
Defendant.)

SUPERSEDING INFORMATION

The United States Attorney charges:

Introductory Allegations

1. Defendant ADAM SHAFI resided in California.
2. Bank of America was a financial institution, as that term is defined in Title 18, United States Code, Section 20, the deposits of which were insured by the Federal Deposit Insurance Corporation (“FDIC”).
3. Secto Services LLC was a title company located in Florida.
4. Setco Services LLC held a bank account at Centennial Bank located in Florida.

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The Scheme to Defraud

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2 5. Beginning at a date unknown, but no later than April 2015, and continuing through on or
3 about June 29, 2015, SHAFI knowingly devised, intended to devise, and carried out a scheme and
4 artifice to defraud a financial institution as to a material matter and to obtain money and property under
5 the control of financial institutions by means of materially false and fraudulent pretenses,
6 representations, promises, and concealment of material facts, which scheme is described further below.
7 As part of the scheme to defraud, SHAFI deposited a fraudulent check, which purported to have been
8 issued by Setco Services LLC on its account at Centennial Bank.

9 6. Specifically, on or about June 29, 2015, ADAM SHAFI deposited into his Bank of
10 America checking account number -8058 fraudulent check number 1233, which he falsely represented to
11 have been drawn on Setco LLC's account at Centennial Bank, in the amount of \$2200. The check was
12 dated April 16, 2015, payable to SHAFI. By depositing the check into his Bank of America account,
13 SHAFI falsely represented that he was entitled to the funds as if the check had been lawfully issued.

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COUNT ONE: (18 U.S.C. §§ 1344(1), (2) – Bank Fraud)

7. The factual allegations in paragraphs 1 through 6 are re-alleged and incorporated herein as if set forth in full.

8. On or about June 29, 2015, in the Northern District of California and elsewhere, the defendant,

ADAM SHAFI,

did knowingly and with the intent to defraud devise and execute, and attempt to execute, a scheme and artifice to defraud a financial institution as to a material matter and to obtain moneys, funds, credits, assets, and other property that were then under the custody and control of financial institutions, by means of false and fraudulent pretenses, representations, promises, and concealment of material facts.

In violation of Title 18, United States Code, Sections 1344(1) and 1344(2).

DATED: December 5, 2018

ALEX G. TSE
United States Attorney

JOHN H. HEMANN
Deputy Chief, Criminal Division

Approved as to form:


ELISE LAPUNZINA
Assistant United States Attorney